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Safeco Insurance Company Of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SAFECO INSURANCE COMPANY OF
AMERICA,

Plaintiff,

v.

JOHN JOSEPH-LOUIS JOHNSON, II, an
individual, and HONOUR LIGHT
INTERNATIONAL, INC.

Defendants.

CASE NO.: 2:23-cv-00743-JCM-NJK

**STIPULATION FOR EXTENSION OF
TIME TO FILE ANSWER TO
COMPLAINT**

(First Request)

Plaintiff Safeco Insurance Company Of America (“Safeco”) and Defendant Honour Light International, Inc. (“HLI”) (collectively the “Parties”) hereby submit this Stipulation to Extend the Time Within Which to Answer Plaintiffs’ Complaint. The parties have stipulated to extend the response deadline to July 21, 2023.

The original deadline for HLI to respond to the Complaint was June 16, 2023. Charles Yu, owner of HLI, contacted Safeco to explain that he was having trouble securing counsel to represent HLI. Since HLI is a corporation organized under the laws of the State of Nevada, Mr. Yu is not permitted to represent HLI *in proper person* in this matter. Mr. Yu, on behalf of HLI, requested an additional 30 days to attempt to secure counsel. Safeco does not object to HLI having additional time to secure counsel.

Excusable negligent exists in this case to grant HLI this additional time. Although the formal request is being made after the deadline for HLI to answer the complaint, Safeco believes that HLI has been diligent in its attempts to locate counsel. The parties have suffered no prejudice to this requested extension.

Accordingly, Safeco Insurance Company Of America and Honour Light International, Inc. respectfully request that this Court find that excusable neglect exists relating to this stipulation and permit Honour Light International, Inc. additional time to secure counsel and respond to the Complaint by July 21, 2023.

Dated: June 22, 2023

HONOUR LIGHT INTERNATIONAL,
INC.

CLYDE & CO US LLP

/s/ Charles Yu
Charles Yu, Owner
Honour Light International, Inc.

By: /s/ Dylan Todd
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*Attorneys for Plaintiff
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ORDER

The above Stipulation **IS SO ORDERED.**


UNITED STATES MAGISTRATE JUDGE

Dated: June 23, 2023